

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

RICARDO SANTILLAN
Plaintiff,

vs.

HISD.

Defendant.

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CIVIL ACTION NO. 4:10-CV-02118

**JOHN-BAPTIST A. SEKUMADE'S MEMORANDUM IN SUPPORT OF MOTION
TO WITHDRAW AS ATTORNEY IN CHARGE**

A. Introduction

1. Plaintiff is Ricardo Santillan; defendant is the Houston Independent School District.
2. Plaintiff sued defendant for the violation of his rights under the Americans with Disabilities Act.

B. Argument

3. There is good cause for this court to grant the motion to withdraw because counsel has had challenges in communicating with plaintiff. Plaintiff refused to respond to two Requests for Admission, either admitting or denying them, instead adamantly refusing to answer them.
4. In addition to this, after plaintiff received discovery requests propounded by opposing counsel, plaintiff informed movant that he would comply with the requests for production.

To date, he has failed to produce the requested documents. Even though he was informed that discovery is late and that opposing party has filed a motion to compel.

5. Movant does not know if Plaintiff Ricardo Santillan is in support of this motion or not. However, before the hearing date, would produce evidence that plaintiff has been served with notice of the.

5. Ricardo Santillan's last known address is 12035 Huffmeister Road Apt. 814 Cypress Texas 77429.

6. Houston Independent School District has filed a motion to compel. Hearing for said motion is September 8, 2011.

C. Conclusion

6. Movant's attorney has had problems communicating with plaintiff. Plaintiff has also failed to comply and respond to discovery requests propounded by opposing counsel. John-Baptist Sekumade asks this court to grant his motion to withdraw.

Respectfully submitted,

By: /s/
John-Baptist Sekumade
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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I certify that on August 23, 2011 a true and correct copy of Plaintiff's Motion to withdraw was served via electronic filing on opposing counsel.

/s/
John-Baptist Sekumade

CERTIFICATE OF CONFERENCE

I certify that I conferred with opposing counsel Paul Lamp concerning movant's motion to withdraw. As he had stated in my motion to enlarge time, he requested that I sent my motions to him first before he can determine whether to oppose or not.

_____/s/
John-Baptist Sekumade